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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

10 UNITED STATES OF AMERICA,
11 Plaintiff,
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13 v.
14 PAUL RICHARD RANDALL,
15 Defendant.

Case No. 2:25-mj-3689

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**DECLARATION OF REUVEN L.
COHEN IN SUPPORT OF
DEFENDANT PAUL RICHARD
RANDALL'S APPLICATION FOR
RECONSIDERATION OF ORDER
SETTING CONDITIONS OF
RELEASE**

*Filed concurrently with Memorandum of
Points and Authorities in Support of
Application for Reconsideration of Order
Setting Conditions of Release or Detention*

Judge: Hon. Brianna Mircheff
Date: July 8, 2025
Time: 1:00 p.m.

1 **DECLARATION OF REUVEN L. COHEN**

2 I, Reuven L. Cohen, declare as follows:

3 1. I am over the age of eighteen and am an attorney duly licensed to practice
4 law in the State of California. I am a partner at Cohen Williams LLP and am specially-
5 appearing counsel for Defendant Paul Richard Randall in connection with these bail
6 proceedings. I make this declaration in support of Mr. Randall's Application for
7 Reconsideration of Order Setting Conditions of Release or Detention.

8 2. On Monday, June 30, I attempted to meet with Mr. Randall at White
9 Memorial Hospital where he is incarcerated. I was turned away by hospital staff. The
10 following day, I sought assistance vis-à-vis visitation with the United States Marshals
11 Service (the "USMS"). Despite the fact that visitation at White Memorial Hospital is far
12 more arduous, for example, than visitation at the Metropolitan Detention Center, the
13 USMS has been terrific in facilitating visits with Mr. Randall.

14 3. My visits with Mr. Randall do not occur in private. Guards are assigned to
15 Mr. Randall around the clock, and they have told me that they must keep Mr. Randall in
16 their line of sight. That requirement necessarily means that the door to Mr. Randall's
17 hospital room remains open, which also necessarily means that the guards are within
18 earshot of all attorney-client communications.

19 4. Mr. Randall does not have access to his legal paperwork, including, among
20 other things, his notes, the complaint against him, and other important documents. All
21 such documents were confiscated.

22 5. Mr. Randall has no access to family or friends, as he is not permitted phone
23 calls.

24 6. Mr. Randall has nothing to read. He has no television or entertainment of
25 any kind. He is chained to his hospital bed. He urinates while chained to his bed.

26 7. During my initial call with the government, I expressed surprise that the
27 government had orchestrated Mr. Randall's arrest. The government knew, of course, that
28 Mr. Randall was willing to self-surrender, that he had been aware of the charges for

1 months, that he had sat for a proffer with the prosecutors on this matter, that the
2 government had seized millions of dollars from him, and that his lawyer had been out of
3 the country. The government did not know that the day after his arrest, Mr. Randall was
4 scheduled for an essential doctor's visit. The government insisted, however, that the visit
5 may have been immaterial, as Mr. Randall was a malingeringer who had falsely claimed to
6 have suffered a heart attack while incarcerated at FCI Lompoc. The government
7 provided no records supporting this specious assertion to me or to this Court. The only
8 records now before this Court make it clear that Mr. Randall has a life-threatening heart
9 condition.

10 8. My firm has requested records from FCI Lompoc. In the meantime, on
11 July 3, 2025, I obtained Mr. Randall's medical records from UCI Placentia Linda
12 Hospital. A true and correct copy of the relevant portions of those records is attached as
13 Exhibit 1.

14 9. At 11:20 a.m. on July 7, 2025, I was able obtain Mr. Randall's medical
15 records from White Memorial Hospital where he is currently incarcerated. A true and
16 correct copy of the relevant portions of those medical records is attached as Exhibit 2.

17 10. I spoke with Mr. Randall's doctor today. He informed that Mr. Randall
18 requires, for indefinite duration, supplementation of his oxygen using nasal tubes hooked
19 up to an oxygen tank. In addition, Mr. Randall's heart condition is life-threatening.
20 Mr. Randall's doctor informed me that Mr. Randall needs to remain in the care of the
21 hospital for an additional forty days in order for his condition to stabilize.

22 11. Two men assigned to guard Mr. Randall informed me that they estimated
23 that the cost of holding Mr. Randall at White Memorial Hospital is approximately
24 \$20,000 per day.

25 I declare under penalty of perjury under the laws of the United States of America
26 that the foregoing is true and correct.

1 Executed this 7th day of July, 2025, at Los Angeles, California.
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5 */s/ Reuven L. Cohen*
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